

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 18-251 (DWF/KMM)
	)	
v. Plaintiff,	)	
	)	<b>MOTION FOR TRANSPORT AND</b>
CHASE MACAULEY	)	<b>VISITATION</b>
ALEXANDER,	)	
	)	
Defendant.	)	

The Defendant, Chase Macauley Alexander, by and through his attorney, hereby respectfully moves the Court for an Order directing the U.S. Marshal Service to transport Mr. Alexander to the St. Paul Federal Courthouse on January 23, 2019 so that Mr. Alexander may meet with his mother in the secure U.S. Marshal holding area.

Mr. Alexander is twenty years old, but has been under the care of mental health professionals since the age of thirteen. He is currently under a civil commitment in the state of Minnesota through the Dakota County Courts, civil case no. 19HA-PR-17-489. Mr. Alexander was originally civilly committed on October 19, 2017 for his mental disability and the commitment was continued after a six-month review hearing on April 12, 2018. At the time of his arrest on October 23, 2018, Mr. Alexander was living in a group home for mentally disabled adults. He has been detained since that time.

As part of his mental disability, Mr. Alexander is very guarded and does not communicate with individuals he does not know and trust. He is medicated, but continues to struggle with communication and responding to questions. While Counsel believes that Mr. Alexander is competent to proceed under the minimum legal standard of mental incompetency set forth in *Dusky v. United States*, 362 U.S. 402, (1960), and the Insanity

Reform Act (IRA), 18 U.S.C. §4142(a), communication with Mr. Alexander has been very difficult. Thus, while Mr. Alexander is mentally competent under *Dusky*, he nevertheless has a significantly impaired capacity to assist in his case.

Both Counsel and Mr. Alexander's mother are hoping that a private visit between Mr. Alexander and his mother in a visitation room, typically used by attorneys, would help. Thus far, Mr. Alexander has only been able to see and speak with his mother through the video visitation system at the Sherburne County Jail.

For these reasons, Counsel is requesting that Mr. Alexander be brought to the United States Federal Courthouse in St. Paul by the U.S. Marshal Service so that he may have a private one-on-one visit with his mother. The government does not oppose this request.

Dated: January 15, 2019

Respectfully submitted,

*s/Shannon Elkins*

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